

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

CASE NO: 15-36520-KLP
CHAPTER 13

FILED
2016 MAR 14 AM 9:36
U.S. BANKRUPTCY COURT
RICHMOND DIVISION

In re
David G. Lambert
Brenda L. Lambert

Debtor(s),

ANDREW J. HOLICK
NOTICE TO DISMISS OR RE-HEAR NOTICE OF MOTION TO EMPLOY SPECIAL
COUNSEL

COMES NOW the creditor, Andrew J. Holick, and hereby serves its notice of Request to dismiss or re-hear the MOTION TO EMPLOYE SPECIAL COUNSEL, filed March 7, 2016.

This Creditor certifies that he was unaware of the hearing scheduled for March 9, 2016 until after it took place.

This Creditor further certifies that as of March 13, 2016, he has yet to receive the filing by mail, fax or phone from Debtors counsel, Jason M. Krumbein, Esq.

In review of Mr. Krumbein's certification of mailing, this Creditors name, nor address are mentioned anywhere.

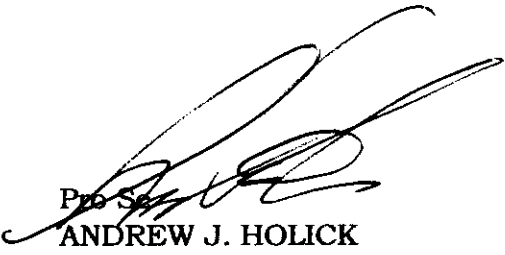
This Creditor denies number 8 in the motion based on the following:
The Debtors, Brenda L. Lambert and David G. Lambert have filed several prior bankruptcies in the past years that have been both dismissed and discharged per 11 U.S.C. 362.

They are not entitled to an automatic stay for the life of this Chapter 13 filing.
According to the document dated December 23, 2015 by William C. Redden, Clerk, US

Bankruptcy Court, the stay was limited to 30 days or may not exist at all.

The Garnishment was filed more than 60 days after the filing of this
Bankruptcy.

WHEREFORE, this Creditor respectfully requests this honorable Court to
dismiss this action until it is properly filed and served on the Creditors. If not, the
Creditor asks that the Court schedule this matter to be re-heard at a date convenient
for all parties. This Creditor further asks that this Court deny Number 8 as there is
no violation of the automatic stay. Prior Counsel for the Debtors, Pia North did not
request an extension of the stay. Also, to deny Number 10, due to the fact Mr.
Krumbein has not attempted to resolve this issue and there is no violation of the
automatic stay. Prior Counsel for the Debtors, Pia North, did not request and
extension of the stay.



Pro Se
ANDREW J. HOLICK
8907 Royal Birkdale Drive
Chesterfield, VA 23832
(804) 350-5942

CERTIFICATE OF SERVICE

I CERTIFY that a copy has been furnished either by electronic or standard first
class mail on March 14, 2016, to: David G. Lambert and Brenda L. Lambert,
Debtor(s), 202 E. Brookland Park Blvd., Richmond, VA 23222; Jason M. Krumbein,
Esq., Debtor(s) Attorney in Bankruptcy, Krumbein Consumer Legal Services, Inc.
1650 Willow Lawn Drive, Suite 201, Richmond, VA 23230; Suzanne E. Wade, Chapter
13 Trustee, PO Box 1780, Richmond, VA 23218-1780 Fax: (804) 775-0986 and all
creditors listed on the attached Service List.

Given under my hand this 14th day of March, 2016

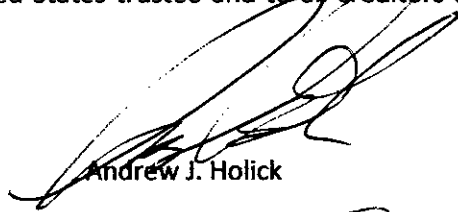


ANDREW J. HOLICK

Case No. 15-36520-KLP

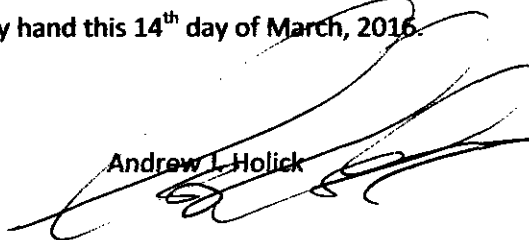
CERTIFICATE OF SERVICE

I CERTIFY that on March 14, 2016, I have mailed a true copy of the foregoing documents by mail to the Debtor(s), Chapter 13 Trustee, the United States trustee and to all creditors and parties in interest of the mailing list attached hereto.



Andrew J. Holick

Given under my hand this 14th day of March, 2016.



Andrew J. Holick

David G. Lambert and
Brenda L. Lambert
202 E. Brookland Park Blvd.
Richmond, VA 23222

Suzanne E. Wade
Chapter 13 Trustee
PO Box 1780
Richmond, VA 23218-1780
Fax: (804)775-0986

Alfa Vision Insurance Co
PO Box 2328
Brentwood, TN 37024-2328

Avid Acceptance
PO Box 708580
Sandy, UT 84070-8580

Avid Acceptance, LLC
6995 Union Park Center
Midvale, UT 84047-6047

CJW Medical Center
Post Office Box 99008
Bedford, TX 76095-9108

City Auto
4000 Regent Blvd
Irving, TX 75063-2246

City of Richmond DPU Bank
Dept. of Public Utilities
730 E. Broad Street, 5th Floor
Richmond, VA 23219-1861

Comcast
5401 Staples Mill Road
Richmond, VA 23228-5443

Commonwealth Hospitalist Serv.
4050 Innslake Dr.
Suite 308
Glen Allen, VA 23060-3327

Consumer Portfolio Svc.
Attn: BANKRUPTCY
19500 Jamboree Rd.
Irvine, CA 92612-2401

Dominion Virginia Power
PO Box 26543
Richmond, VA 23290-0001

Focus Recovery Solutions
Attn: Bankruptcy
9701 Metropolitan Court, Suite B
Richmond, VA 23236

Fast Auto Loan
5218 West Broad St.
Richmond, VA 23230-3010

First Credit Corporation
PO Box 9300
Boulder, CO 80301-9300

First Credit Corporation
PO Box 9300
Boulder, CO 80301-9300

Henrico County Treasurer PP
PO Box 90775
Henrico, VA 23273-0775

Ntelos
PO Box 580423
Charlotte, NC 28258-0423

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Produce Source Partners
13167 Telecourt Rd
Ashland, VA 23005-7454

Solomon & Solomon, PC
5 Columbia Circle
Albany, NY 12203-6374

Jason M. Krumbein, Esq.
Krumbein Consumer Legal
Services, Inc.
1650 Willow Lawn Dr., Suite 201
Richmond, VA 23230

Chesterfield County Property Taxes
Richard A. Cordle, Treasurer
PO Box 26585
Richmond, VA 23261-6585

Commonwealth of VA – Tax
PO Box 2156
Richmond, VA 23218-2156

Consumer Portfolio Svc.
Attn: Bankruptcy
PO Box 57071
Irvine, CA 92619-7071

Henrico Doctors Hospital
PO Box 740760
Cincinnati, OH 45274-0760

HSBC Taxpayer Finance
90 Christiana Road
New Castle, DE 19720-3118

IC Systems, Inc.
PO Box 64378
St. Paul, MN 55164-0378

Internal Revenue Service
Centralized Insolvency Unit
PO Box 7346
Philadelphia, PA 19101-7346

Prestige Financial Svc
Attn: Bankruptcy
PO Box 26707
Salt Lake City, UT 84126-0707

Southwest Credit Systems
4120 International Parkway
Suite 110
Carrollton, TX 75007-1958

Verizon Wireless
PO Box 3397
Bloomington, IL 61702-3397

United States Bankruptcy Court
Eastern District of Virginia
701 East Broad Street
Richmond, VA 23219
Attn: Clerk of Court

B20A (Official Form 20A) (Notice of Motion or Objection) (12/10)

EDVA (12/10)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

In re: David G. Lambert Division
Brenda L. Lambert

[Set forth here all names including married, maiden, and trade names used by debtor within last 8 years.]

Debtor

Case No. 3:15-BK-36520KLP

Chapter 13

Address 202 E. Brookland Park Blvd
Richmond VA 23222

Last four digits of Social Security or Individual Tax-payer

Identification (ITIN) No(s), (if any): 4728

Employer's Tax Identification (EIN) No(s), (if any): 0370

NOTICE OF MOTION (OR OBJECTION)

Andrew J Helick has filed papers with the court to Dismiss or
Rehear Notice of Motion to Employ Special Counsel.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before

14 Days From Today you or your attorney must:

- ☒ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court

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You must also mail a copy to:

☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

☒ Attend the hearing on the motion (or objection) scheduled to be held on April 6, 2016 at 10:00 A m. at United States Bankruptcy Court, 701 E. Broad St. Beale
Judge Phillips Room 5100, Richmond VA 23219

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 3-14-2016

Signature, name, address and telephone number of person giving notice:

Pro Se
Andrew J. Heslick
8907 Royal Birchdale Dr.
Charter Field, VA 23832
Virginia State Bar No. _____
Counsel for _____

Certificate of Service

I hereby certify that I have this 14th day of MARCH, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

[Signature]